

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : **DATE FILED:** _____

v. : **CRIMINAL NO.** _____

JEAN H. DAZULMA : **VIOLATIONS: 18 U.S.C. § 371**
a/k/a “Jean H. Dezulma” **(Conspiracy - 1 count)**

INDICTMENT

1. At all times material to this indictment, defendant JEAN H. DAZULMA lived at 149 Linden Avenue, Irvington, New Jersey, and was the registered owner of a 1995 Mercedes Benz Model C280, VIN WDBHA28E4SF148646.

THE CONSPIRACY

2. From in or about August 1998 through on or about September 18, 1998, in the Eastern District of Pennsylvania and elsewhere, defendant

JEAN H. DAZULMA
a/k/a “Jean Dezulma”

conspired and agreed with others known and unknown to the grand jury, to commit an offense against the United States, that is, to devise and intend to devise a scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme to defraud, used the United States mails and caused the use of the United States mail, in violation of Title 18, United States Code, Section 1341.

MANNER AND MEANS

It was part of the conspiracy that defendant JEAN H. DAZULMA:

1. falsely reported to the police and to his insurance company that his motor vehicle had been stolen, when in fact he had given the vehicle to persons known to the grand jury with the understanding that they would alter, dismantle or otherwise dispose of the vehicle, causing the insurance company to pay approximately \$27,000.00 in connection with the vehicle;

2. caused the United States mails to be used to execute the scheme to defraud his insurance company, in that he mailed to the insurance company various documents associated with the fraudulent loss claim, and the insurance company mailed to the lien holder and to DAZULMA checks as payment for the fraudulent loss claim.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its objects, the following persons performed the following overt acts within the Eastern District of Pennsylvania and elsewhere.

1. On or about August 13, 1998, defendant JEAN H. DAZULMA gave to a person known to the grand jury as J.P. his 1995 Mercedes Benz Model C280, VIN WDBHA28E4SF148646.

2. On or about August 13, 1998, J.P. delivered the 1995 Mercedes Benz to Jean Thelemaque, prosecuted elsewhere.

3. On or about August 13, 1998, in Philadelphia and Cheltenham, Pennsylvania, Jean Thelemaque sold to persons known to the grand jury for \$2300.00 in cash the 1995 Mercedes Benz, representing that the owner of the vehicle would falsely report that the vehicle had been stolen and would submit a false loss claim to his insurance company.

4. On or about August 15, 1998, defendant JEAN DAZULMA falsely reported to the Newark, New Jersey Police Department that his 1995 Mercedes Benz had been stolen in a car jacking at approximately 1:45 a.m. on August 15, 1998.

5. On or about August 17, 1998, defendant JEAN DAZULMA falsely reported to his insurance company, U.S. Fidelity and Guaranty Company in Baltimore, Maryland, that his 1995 Mercedes Benz had been stolen.

6. On or about September 10, 1998, defendant JEAN DAZULMA submitted the required theft affidavit forms to U.S. Fidelity and Guaranty Company, 5801 Smith Avenue, Baltimore, Maryland.

7. As a result of the false loss claim submitted by defendant JEAN DAZULMA, on or about September 16, 1998, U.S. Fidelity and Guaranty Company, 5801 Smith Avenue, Baltimore, Maryland, mailed to the Mercedes Benz Credit Corporation, P.O. Box 120001, Dallas, Texas, a check in the amount of \$17,640.25, representing the outstanding loan balance on the car.

8. As a result of the false loss claim submitted by defendant JEAN DAZULMA, on or about September 18, 1998, U.S. Fidelity and Guaranty Company, 5801 Smith

Avenue, Baltimore, Maryland, mailed to DAZULMA, 149 Linden Avenue, Irvington, New Jersey, a check in the amount of \$10,101.05, representing his equity interest in the car.

In violation of Title 18, United States Code, Section 371.

A TRUE BILL:

FOREPERSON

PATRICK L MEEHAN
United States Attorney